

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

2015 MAY 21 PM 3: 20

CLERK

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ALICE H. ALLEN, et al.,

Plaintiffs,

v.

DAIRY FARMERS OF AMERICA, INC., and  
DAIRY MARKETING SERVICES, LLC,

Defendants.

Civil Action No. 5:09-CV-00230-cr

**SIMILARLY-SITUATED CLASS REPRESENTATIVES' MOTION TO ALLOW  
PROSPECTIVE CLASS COUNSEL ACCESS TO CONFIDENTIAL MATERIALS AND  
TO POSTPONE THE JUNE 1, 2015 HEARING FOR SIXTY DAYS**

Sifting through the legal profession from Jerusalem to Los Angeles and London to Texas, we have found counsel who are willing and able to fairly and adequately represent the interests of this class where current counsel has failed to do so. Mel Hess, a Lancaster Pennsylvania attorney who actively represents farmers in a number of issues, and Calev Myers, of the Jerusalem Institute of Justice, were both helpful in finding and weighing replacement counsel.

Two Massachusetts law firms, Nystrom Beckman & Paris, LLP and Zelle McDonough and Cohen, LLP, and the New York office of FisherBroyles, LLP, have each expressed interest in taking on the case and representing the class at trial. These firms have extensive trial experience in complex, multiparty litigation, and a long history of trying cases and obtaining real relief for their clients.

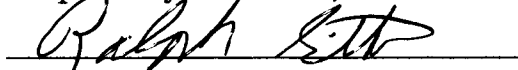
So far, the three firms have investigated the claims, spoken with us and/or Mel Hess, and reviewed a limited number of the pleadings and hearing transcripts from this

case. Based on their review, these firms are very seriously interested. However, some of them have advised us that before they can make a firm commitment, they need to review pleadings and expert reports that have been designated as Confidential and/or Highly Confidential under the Protective Order in this case [Document No. 62]. We therefore respectfully request the Court to allow these firms to sign the Protective Order so that they may review the materials subject to the Protective Order including, but not limited to: (1) the class certification pleadings; (2) the summary judgment pleadings; and (3) all expert reports filed in this case.

Also, we wish to request a sixty-day postponement of the June 1st hearing so that these firms can review these materials and be in a position to make a definite commitment to the Court and the class prior to the hearing. A word from Jerusalem:

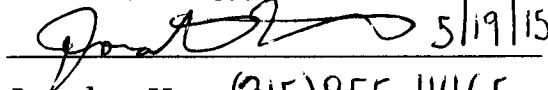
"The mills of justice grind slow, yet they grind fine." – Calev Myers.

Respectfully submitted,



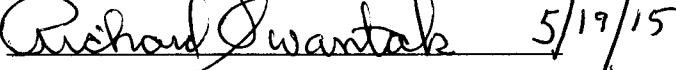
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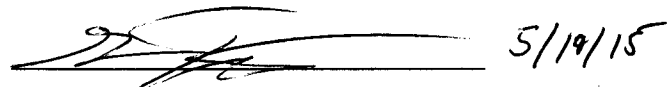
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